

1  
2 IN THE UNITED STATES DISTRICT COURT  
3 FOR THE DISTRICT OF SOUTH CAROLINA  
4 CHARLESTON DIVISION

5  
6 RENE CARDOSO,

7  
8 Plaintiff,

9  
10 v.

11 No. 2:16-cv-1058-PMD

12  
13 MITCHELL MECHANICAL, L.L.C.,

14  
15 Defendant.

16  
17 VIDEOCONFERENCE DEPOSITION OF

18  
19 JULIE SAWYER-LITTLE

20  
21 11:00 a.m. - 1:45 p.m.

22  
23 June 28, 2017

24  
25 Durham, North Carolina

Reported By: Joseph C. Spontarelli, CCR

A. WILLIAM ROBERTS, JR. & ASSOCIATES  
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1 and vocational. Dealing specifically with the  
2 medical information I assume you obtain copies  
3 of medical records.

4 A Yes.

5 Q You said that you call treaters.  
6 What treaters have you talked with in  
7 connection with this case?

8 A I consulted with Dr. Taub and Dr.  
9 White.

10 Q Why did you consult with those two as  
11 opposed to any of the others that might have  
12 been involved?

13 A Those are his current providers.

14 Q Did you think it was not necessary to  
15 talk to any of the other doctors involved in  
16 this case?

17 A No.

18 Q No you didn't think it was necessary,  
19 is that correct?

20 A That's correct.

21 Q And why not?

22 A Because there have been no current  
23 treatment by those providers. When I looked at  
24 the period over the last couple years he  
25 continues to be treated primarily by Dr. Taub



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1 and then has recently started being treated by  
2 Dr. White.

3 Q Do you know how he came to be treated  
4 by Dr. White?

5 A Can you repeat that?

6 Q Do you know how it was that he came  
7 to be treated by Dr. White?

8 A I don't.

9 We may have to disconnect and  
10 reconnect.

11 Q Are we having problems?

12 A Yes. It's not just me. The court  
13 reporter is having difficulty as well.

14 MR. REEVES: That's fine.

15 MR. LAIL: Phil, give us a second.  
16 I'm going to get the gal and see if she can get  
17 the audio better for us.

18

19 (Recess.)

20

21 BY MR. REEVES:

22 Q Ms. Sawyer-Little, we were talking  
23 about the treaters that you had talked with and  
24 you mentioned that it was just Dr. Taub and Dr.  
25 White, and that you didn't think it was



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1 BY MR. REEVES:

2 Q Not at all?

3 A No. Not in regards to the type of  
4 work he did, no.

5 Q He also indicated that he had a  
6 fairly good command of the English language but  
7 admits he's not as strong in reading English.  
8 Does his inability to read English as well play  
9 any part in his employability?

10 A It potentially would for jobs that  
11 are less exertional in nature.

12 Q Obviously if those jobs exist and he  
13 can do them then he would be able to work,  
14 correct?

15 MR. LAIL: Object to form.

16 THE WITNESS: Ask that one more time.

17 BY MR. REEVES:

18 Q If there were jobs that were less  
19 exertional than the job he was doing then by  
20 definition he would be able to work, correct?

21 MR. LAIL: Object to form.

22 THE WITNESS: If that was the only  
23 criteria that we were looking at, yes.

24 BY MR. REEVES:

25 Q He also gave you some information



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1 concerning his work history, and he indicated  
2 that he began working with Hartland Resources  
3 as an electrician in 2008 and was making \$19 an  
4 hour, is that correct?

5 A Correct.

6 Q What did you do to verify that  
7 information?

8 A In the 2015 report I was provided  
9 with the Statement of Compensation from the  
10 workers' comp provider.

11 Q You say you were provided. Who  
12 provided that to you?

13 A Mr. D'Agata, the attorney in  
14 Charlotte.

15 Q Did you do anything to determine how  
16 that wage had been calculated?

17 A It was calculated on there. It  
18 showed based on his earnings what his weekly  
19 and hourly rate was.

20 Q Did you ask for or receive any other  
21 documentation from Mr. Cardoso concerning his  
22 work history?

23 A I don't believe so.

24 Q Other than the information that you  
25 got from the workers' compensation carrier do

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1 THE WITNESS: I consulted with the  
2 current providers.

3 BY MR. REEVES:

4 Q But you didn't consult with all of  
5 them did you?

6 A No.

7 Q You have a chart in your report. It  
8 say occupation, hourly rate, annual salary  
9 range. It says electrician. Why did you use  
10 electrician as the occupation that you  
11 surveyed?

12 A Because my understanding in getting  
13 information from him and also analyzing the  
14 task that he did that he was basically working  
15 as an electrician under a licensed electrician  
16 on-site.

17 Q The occupation that you looked at  
18 which is electrician, was it a licensed or  
19 unlicensed electrician?

20 A In the BLS and ESC data it doesn't  
21 designate that.

22 Q Can you say that again?

23 A Sure.

24 In reviewing the Bureau of Labor  
25 Statistics and the North Carolina data it

